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**IN THE UNITED STATES JUDICIAL DISTRICT COURT
FOR THE DISTRICT OF UTAH**

IN RE: JOINTLY MANAGED R.S. 2477
ROAD CASES LITIGATION

**UNOPPOSED MOTION TO EXTEND
TIME FOR PLAINTIFFS TO FILE
RESPONSE TO U.S. MOTION TO
ENFORCE**

Case Nos. 2:10-cv-1073

2:11-cv-1043	2:11-cv-1045
1:12-cv-0105	2:12-cv-0423
2:12-cv-0424	2:12-cv-0425
2:12-cv-0426	2:12-cv-0428
2:12-cv-0429	2:12-cv-0430
2:12-cv-0434	2:12-cv-0447
2:12-cv-0461	2:12-cv-0462
2:12-cv-0466	2:12-cv-0467
2:12-cv-0471	2:12-cv-0472
2:12-cv-0477	

Judge: Hon. Clark Waddoups

Plaintiff, the State of Utah (“Plaintiff” or “State”), respectfully moves this Court to extend the time for Plaintiffs to file responses to the United States’ Motion to Enforce the

Protections of the Quiet Title Act, filed in all of the above-captioned cases on Friday, December 6, 2024 (“Motion”). Plaintiffs’ responses are currently due on Monday, February 10, 2025.

By this motion, the State respectfully requests the Court to extend Plaintiffs’ deadline by two weeks up to and including February 24, 2025. Good cause exists for Plaintiffs’ request due to limited availability of attorneys and support staff, as well as various competing filing deadlines throughout the month of February.

Plaintiffs discussed the requested extension with the United States.¹ The United States also indicated it would require additional time beyond the ordinary 14 days to prepare its reply due to staffing and leadership changes associated with the new administration; the United States communicated to Plaintiffs that it will require an extension of six weeks for its reply, up to and including April 7, 2025, which Plaintiffs do not oppose.² The undersigned is authorized to represent to the Court that the United States supports the request for extension, as does counsel for Carbon and Kane. Proposed order submitted herewith.

DATED this 7th day of February 2025.

UTAH ATTORNEY GENERAL’S OFFICE

/s/ Kathy A.F. Davis
Kathy A.F. Davis
Assistant Attorney General
Attorney for Plaintiff State of Utah

¹ SUWA was copied on correspondence regarding the extension request.

² Present motion notwithstanding, the parties respectfully request that the Court continue to proceed with other matters affecting the Bellwether trial, as said matters are not impacted by the United States’ Motion to Enforce.